

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S DE R.L. DE  
C.V., *et al.*

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC)  
(Jointly Administered)

FERNANDO PEREZ-CORREA IN HIS  
CAPACITY AS FOREIGN REPRESENTATIVE  
OF PERFORADORA ORO NEGRO, S. DE R.L.  
DE C.V.; JOSE ANTONIO CAÑEDO-WHITE;  
CARLOS WILLIAMSON-NASI; GONZALO  
GIL-WHITE; AND MIGUEL ÁNGEL  
VILLEGAS-VARGAS

Plaintiffs,

- against -

ASIA RESEARCH AND CAPITAL  
MANAGEMENT LTD.; GHL INVESTMENTS  
(EUROPE) LTD.; ORO NEGRO PRIMUS PTE.,  
LTD.; ORO NEGRO LAURUS PTE., LTD.; ORO  
NEGRO FORTIUS PTE., LTD.; ORO NEGRO  
DECUS PTE., LTD.; ORO NEGRO IMPETUS  
PTE., LTD.; SHIP FINANCE INTERNATIONAL  
LTD.; and DOES 1-100

Defendants.

Adv. Pro. No. 19-01360 (SCC)

**[PROPOSED] ORDER GRANTING BONDHOLDER DEFENDANTS'  
MOTION TO DISMISS THE COMPLAINT**

Upon consideration of the Motion to Dismiss the Complaint (the “Motion”) of Asia Research and Capital Management Ltd., GHL Investments (Europe) Ltd., and Ship Finance International Ltd. (collectively, the “Bondholder Defendants”), and all other papers filed by the parties in support of and in opposition to the Bondholder Defendants’ Motion,

IT IS HEREBY ORDERED that Bondholder Defendants' Motion to Dismiss the  
Complaint is GRANTED.

Dated: \_\_\_\_\_  
New York, New York

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THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE